

UNITED STATES DISTRICT COURT

for the
Northern District of New York

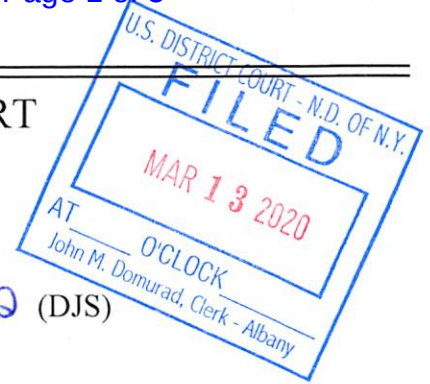
UNITED STATES OF AMERICA

v.

JOHN MORGAN, a/k/a "ilikyoung",

Defendant.

Case No. 1:20-MJ-182 (DJS)



CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief. On or about the dates of March 11 to March 12, 2020, in the county of Fulton in the Northern District of New York, the defendant violated:

Code Section

Title 18 United States Code, Section
2252A(a)(2)(A)

Offense Description

Distribution of child pornography

This criminal complaint is based on these facts:
Please see attached affidavit.

☒ Continued on the attached sheet.

A handwritten signature in blue ink, appearing to be "B. Seymour".

Complainant's signature

FBI Special Agent Brian P. Seymour

Printed name and title

Sworn to before me and signed in my presence.

Date: March 13, 2020

A handwritten signature in blue ink, appearing to be "D. Stewart".

Judge's signature

City and State: Albany, New York

Hon. Daniel J. Stewart, U.S. Magistrate Judge

Printed name and title

Affidavit in Support of a Criminal Complaint

I, Brian P. Seymour, having been first duly sworn, do hereby depose and state as follows:

1. I am a Special Agent with the Federal Bureau of Investigation (FBI). I have been so employed since September 2007.
2. I am assigned to the Albany Field Office and specifically to a squad investigating federal violations concerning child pornography and the sexual exploitation of children. I have gained experience investigating such crimes through training in seminars and classes, and everyday work related to conducting these types of investigations.
3. I make this affidavit in support of a criminal complaint charging JOHN MORGAN, aka "ilikyoung" ("Morgan"), with knowingly distributing child pornography using a means and facility of interstate and foreign commerce, and in and affecting such commerce, in violation of Title 18 United States Code, Section 2252A(a)(2)(A).
4. The statements contained in this affidavit are based upon my investigation, information provided by other law enforcement officers, and on my experience and training. As this affidavit is being submitted for the limited purpose of securing a criminal complaint, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to believe that Morgan has violated Title 18, United States Code, Sections 2252A(a)(2)(A).

Basis for a Probable Cause Finding

5. Kik Messenger, commonly called "Kik," is an instant messaging application that can be downloaded and installed for free onto a variety of phones. It is typically used to transmit and receive messages, photos, videos, sketches, mobile webpages and other content by users, each of whom must register a username. Kik is known for its features preserving users' "anonymity," such as allowing users to register without providing a telephone number or true name. Kik is

accessed over the Internet.

6. Between on or about March 11, 2020 and March 12, 2020, a Jacksonville, Florida-based FBI employee (“OCE”) was connected to the Internet using a mobile device and accessing Kik. While using the Kik application during this time in an undercover capacity, the OCE repeatedly observed that an individual using the display name “J M,” and user name “ilikyoung,” posted in a group chat room messages in which he solicited child pornography and offered to share a video of himself sexually exploiting a child.

7. On March 11, 2020, at approximately 6:33 a.m., “ilikyoung” posted a 66-second color video with audio depicting a pre-pubescent female who is wearing a black and white striped top, nude from the waist down and lying on her back. The child is pre-pubescent based on the lack of pubic hair, child-size arms and legs, childlike facial features, and a childlike voice. The child appears to be watching an electronic device, and the sound which comes from the device is consistent with those of a children’s television program and movie. Also visible in the video is an unknown adult male’s hand masturbating an erect penis, and adult male legs and hands. During the video, the adult male inserts his penis into the child’s vagina. The adult male appears to ejaculate inside of and on the child’s vagina. The adult male then presses on the child’s pubic area and wipes off what appears to be semen from the child’s vagina with a white napkin or paper towel.

8. On March 11, 2020, the OCE sent a message to “ilikyoung” asking “Is that [you] in the vid [video],” referring to the video I described in the preceding paragraph. Shortly thereafter, “ilikyoung” responded “yes.” The OCE then asked if “ilikyoung” had any more videos to which “ilikyoung” responded “Yes only for trade.”

9. On March 12, 2020, “ilikyoung” sent to the OCE several more images and a video depicting prepubescent females, approximately 5-7 years old, being digitally penetrated by an

adult's hand or having an adult male masturbating near the minor's vaginal area.

10. Responding to FBI Emergency Disclosure Requests, an Internet Service Provider informed the FBI that the Internet Protocol address associated with "ilikyoung's" March 12 communications was a certain residence in Gloversville, Fulton County, New York.

11. On March 12, FBI agents and task force officers set up surveillance in the vicinity of this residence. Meanwhile, the OCE continued to communicate with "ilikyoung," and in the late afternoon of March 12, "ilikyoung" sent the OCE several "selfie"-type images of an adult male.

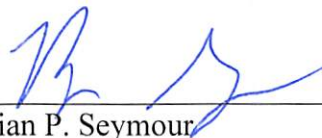
12. At approximately ^{4:25pm to} ~~4:10~~ p.m. on March 12, Morgan – the person depicted in the selfie-type photos referenced in the preceding paragraph – was observed exiting the residence that agents and officers were surveilling. Agents and officers approached him on the street and asked him to place his cell phone on the hood of one of the agent's vehicles, at which time Morgan refused, and damaged the cell phone's screen while resisting commands to comply.

13. Morgan was detained, *Mirandized*, and agreed to speak with agents. He admitted that he used Kik and his screen name was "ilikyoung." He admitted to posting the video received by the OCE depicting the sexual abuse of a minor female (see paragraph 7). He admitted that he accessed the internet from the residence that the FBI was surveilling.

14. Based upon the above information, there is probable cause to conclude that JOHN MORGAN, aka "ilikyoung," has violated Title 18, United States Code, Section 2252A(a)(2)(A), which prohibits knowingly distributing child pornography using a means and facility of interstate and foreign commerce, and in and affecting such commerce.

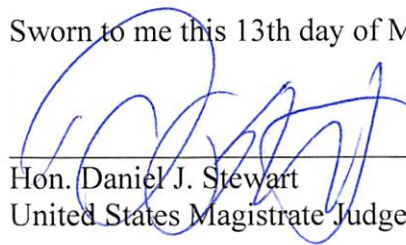
Attested to by the Applicant in Accordance

with the Requirements of Rule 4.1 of the Federal
Rules of Criminal Procedure



Brian P. Seymour
Special Agent
Federal Bureau of Investigation

Sworn to me this 13th day of March 2020.



Hon. Daniel J. Stewart
United States Magistrate Judge